

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

IN RE:	:	CHAPTER 7
	:	
CHRISTINE ANN ISRAEL,	:	BANKRUPTCY CASE NO.
	:	
Debtor.	:	A04-17006-WHD
	:	
	:	JUDGE DRAKE
<u>CHRISTINE ANN ISRAEL,</u>	:	
	:	
Plaintiff,	:	ADVERSARY PROCEEDING NO.
v.	:	
	:	08-1701
U.S. DEPARTMENT OF EDUCATION,	:	
(substituted for DIRECT LOANS),	:	
	:	
Defendant.	:	

FIRST SET OF REQUESTS FOR PRODUCTION FROM DEFENDANT
UNITED STATES DEPARTMENT OF EDUCATION
TO PLAINTIFF CHRISTINE ANN ISRAEL

Pursuant to Bankruptcy Rule 7034 and Federal Rule of Civil Procedure 34, plaintiff Christine Ann Israel is requested to produce the following documents for inspection and copying, within thirty (30) days of service of these Requests for Production, at the office of the undersigned counsel for defendant, located at 600 Richard B. Russell Building, 75 Spring Street, S.W., Atlanta, Georgia 30303, or at such other time or place upon which plaintiff and defendant mutually may agree.



DEFINITIONS

The Definitions set forth in defendant's First Set of Interrogatories to plaintiff are incorporated herein by reference.

INSTRUCTIONS

The Instructions set forth in defendant's First Set of Interrogatories to plaintiff are incorporated herein by reference.

REQUESTS FOR PRODUCTION

Request for Production One All federal income tax returns, with all attachments thereto, filed by or on behalf of plaintiff Christine Ann Israel, any corporation in which plaintiff Christine Ann Israel is or has been an officer, or any partnership in which plaintiff Christine Ann Israel is or has been a partner, for income earned during any period from January 1, 2003, through the date of responding to this Request for Production.

Request for Production Two All state income tax returns, with all attachments thereto, filed by or on behalf of plaintiff Christine Ann Israel, any corporation in which plaintiff Christine Ann Israel is or has been an officer, or any partnership in which plaintiff Christine Ann Israel is or has been a partner, for income earned during any period from January 1, 2003, through the date of responding to this Request for Production.

Request for Production Three All checking or savings account statements issued for any account maintained, in whole or in part, in the name of plaintiff Christine Ann Israel, any corporation in which plaintiff Christine Ann Israel has been or currently is an officer, or any partnership in which plaintiff Christine Ann Israel has been or currently is a partner, during any period from January 1, 2006, through the date of responding to this Request for Production.

Request for Production Four All documents relating to the sale or purchase, by or on behalf of plaintiff Christine Ann Israel, of common stock, mutual fund shares, or money market fund shares, during the period from January 1, 2003, through the date of responding to this Request for Production.

Request For Production Five All documents relating to contributions by plaintiff Christine Ann Israel to a 401(k), IRA, or other retirement account during the period from January 1, 2003, through the date of responding to this Request for Production.

Request for Production Six All documents relating to the purchase, sale or transfer of real property, by or on behalf of plaintiff Christine Ann Israel, during the period from July 1,

2002, through the date of responding to this Request for Production.

Request for Production Seven All documents upon which plaintiff Christine Ann Israel has relied or to which plaintiff Christine Ann Israel has referred in support of her contention that requiring plaintiff to repay to defendant any student loan obligations that plaintiff is seeking to discharge through the subject adversary proceeding would impose an undue hardship upon plaintiff.

Request for Production Eight All other documents upon which plaintiff Christine Ann Israel has relied or to which plaintiff has referred in preparing her responses to defendant's First Set of Interrogatories and/or First Set of Requests for Admissions to plaintiff, which include but are not limited to:

- (A) All applications or promissory notes signed by plaintiff Christine Ann Israel for student loans or consolidations of pre-existing student loan debts owed to defendant;
- (B) All demands to plaintiff Christine Ann Israel for repayments of student loan obligations allegedly owed to defendant; and
- (C) all records reflecting repayment(s) of student loan debts, in whole or in part, by plaintiff Christine Ann Israel to defendant.

Respectfully submitted,

DAVID E. NAHMIAS
UNITED STATES ATTORNEY

/s/ Daniel A. Caldwell
DANIEL A. CALDWELL
ASSISTANT U.S. ATTORNEY
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